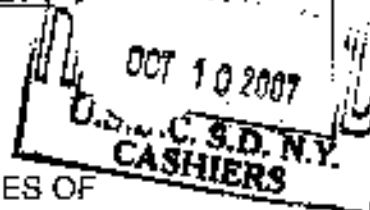


JUDGE STEINUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK-----X
MAERSK LINE,

Plaintiff,

- against -

USCA-SEABELL, INC.,

Defendant.
-----XCIVIL COMPLAINT
IN ADMIRALTY

Plaintiff MAERSK LINE, by its attorneys, LAW OFFICES OF ALBERT J. AVALLONE & ASSOCIATES, as and for its Complaint against defendant USCA-SEABELL, INC., in personam, in a cause of action civil and maritime, alleges upon information and belief:

1. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure, the Ocean Shipping Reform Act of 1999, 46 U.S.C., App. Section 1701, et seq., and Paragraph 26 of the Bills of Lading.

2. At all times hereinafter mentioned, plaintiff MAERSK LINE was and still is a corporation duly organized and existing under the laws of the State of Delaware with offices and a place of business at 6000 Carnegie Blvd., Charlotte, NC 28209.

3. Upon information and belief and at all times hereinafter mentioned, defendant USCA-SEABELL, INC. was and still is a corporation organized and existing under the laws of the State of New York, with offices and a place of business at 50 Harrison St., Hoboken, NJ 07030.

4. From on or about December 1, 2006 to the present, defendant delivered cargoes to plaintiff at various ports for the purpose of having the cargoes carried to various ports of destination, there to be delivered to the consignees and/or their agents, in consideration of payment by defendant to plaintiff of ocean freight and related charges, calculated pursuant to a Service Contract between the parties and/or plaintiff's tariff.

5. Thereafter, defendant made shipments with plaintiff, and incurred charges totalling \$305,975.80.

6. Defendant has failed to remit the payment due of \$305,975.80, although duly demanded (Exhibit A).

7. All shipments were properly carried by plaintiff, or are in the process of being carried by plaintiff.

8. Plaintiff has performed and is performing all acts required to be performed by plaintiff.

9. Defendant has failed and refused and continues to fail and refuse to remit payment of \$305,975.80, although duly demanded.

8. By reason of the foregoing, plaintiff has sustained damages in the amount of \$305,975.80 which, although duly demanded, have not been paid.

WHEREFORE, plaintiff prays:

1. For judgment in the amount of plaintiff's damages, together with interest thereon, costs, disbursements and a reasonable attorney's fee.

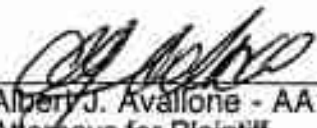
2. That process in due form of law according to the practice of this Court in cases of admiralty and maritime jurisdiction may issue against the defendant citing it to appear and answer all the singular matters aforesaid.

3. That plaintiff have such other and further relief in the premises as in law and justice it may be entitled to receive.

Dated: New York, New York
October 10, 2007

LAW OFFICES OF
ALBERT J. AVALLONE & ASSOCIATES

By


Albert J. Avallone - AA1679
Attorneys for Plaintiff
MAERSK LINE
551 Fifth Avenue, Suite 1625
New York, NY 10176
(212) 696-1760



MAERSK LINE

6508 Carnegie Boulevard, Charlotte, NC 28208

Special Report

Customer Name: USCA SEABELL INC
Customer Number: 33100231448

Group: P

Statement of Account as of: 10/3/2007 01:01 PM

Forwarder Ref

Slipper Ref

Days

Outstanding Amount

Amount Paid

Original Amount

Due Date

Transaction Number

Of Number

Invoice Number

| | | | | | | | | | |
|------------|-----------|-----------|-------------|-------------|-------------|------------|----|-------------------|----------|
| U138485903 | 854873098 | 7/22/2007 | \$2,146.00 | \$0.00 | \$2,146.00 | \$2,146.00 | 72 | OE004827 | OE004827 |
| U138485904 | 854872968 | 7/22/2007 | \$2,133.00 | \$0.00 | \$2,133.00 | \$2,133.00 | 72 | OE004819 | OE004819 |
| U138493949 | 523506969 | 7/22/2007 | \$4,090.00 | \$0.00 | \$4,090.00 | \$4,090.00 | 72 | OE004984 | |
| U138460811 | 523523177 | 7/22/2007 | \$3,999.01 | \$0.00 | \$3,999.01 | \$3,999.01 | 72 | OE004812 | OE004812 |
| U138480831 | 523486745 | 7/22/2007 | \$4,090.00 | \$0.00 | \$4,090.00 | \$4,090.00 | 72 | OE004945 | |
| U138482770 | 523506974 | 7/22/2007 | \$4,090.00 | \$0.00 | \$4,090.00 | \$4,090.00 | 72 | OE004946 | OE004946 |
| U138566011 | 523447227 | 7/23/2007 | \$4,579.18 | \$4,135.00 | \$4,579.18 | \$444.18 | 71 | 23154 WS | |
| U138614819 | 854831354 | 7/26/2007 | \$4,015.00 | \$0.00 | \$4,015.00 | \$4,015.00 | 68 | OE004787 | OE004787 |
| CNC8500779 | 523389944 | 7/30/2007 | \$4,579.15 | \$4,135.00 | \$4,579.15 | \$444.15 | 64 | 23154 WS | |
| U138592000 | 854951528 | 7/30/2007 | \$4,225.00 | \$0.00 | \$4,225.00 | \$4,225.00 | 64 | OE004937 | OE004937 |
| U138512611 | 854952229 | 7/30/2007 | \$2,398.00 | \$0.00 | \$2,398.00 | \$2,398.00 | 64 | OE004926 | OE004926 |
| U138533849 | 854876448 | 8/5/2007 | \$1,999.18 | \$0.00 | \$1,999.18 | \$3,999.18 | 58 | OE004888 | OE004888 |
| U138625773 | 523695209 | 8/6/2007 | \$4,891.00 | \$0.00 | \$4,891.00 | \$4,891.00 | 57 | OE005050 | |
| U138548396 | 854960533 | 8/6/2007 | \$2,863.00 | \$0.00 | \$2,863.00 | \$2,863.00 | 57 | OE005040 | OE005040 |
| U138535046 | 523624676 | 8/8/2007 | \$14,677.01 | \$13,240.00 | \$14,677.01 | \$1,437.01 | 55 | LC ZCC009-2703252 | |
| U138549703 | 523655823 | 8/8/2007 | \$11,741.61 | \$10,592.00 | \$11,741.61 | \$1,149.61 | 55 | LC ZLC009-2703353 | |
| U138788139 | 523616665 | 8/9/2007 | \$17,100.73 | \$14,943.00 | \$17,100.73 | \$2,157.73 | 54 | 6274 | |
| U138567174 | 854831350 | 8/9/2007 | \$4,015.00 | \$0.00 | \$4,015.00 | \$4,015.00 | 54 | OE004786 | OE004786 |
| U138800767 | 854947061 | 8/13/2007 | \$5,585.00 | \$0.00 | \$5,585.00 | \$5,585.00 | 50 | OE004890 | OE004890 |

EXHIBIT "A"



MAERSK LINE

Special Report

3000 Carnegie Boulevard, Charlotte, NC 28209

| Customer Name: USCA SEABELL INC | | Statement of Account as of: 10/3/2007 01:01 PM | | Group: P | |
|---------------------------------|--------------------|--|-----------------|-------------|-------------|
| Customer Number: 33100231448 | Transaction Number | Due Date | Original Amount | Amount Paid | Outstanding |
| Invoice Number | Id Number | | | | Amount |
| U138577910 | 854876446 | 8/13/2007 | \$3,998.31 | \$0.00 | \$3,998.31 |
| U138663986 | 521737025 | 8/13/2007 | \$2,436.00 | \$0.00 | \$2,436.00 |
| U138584544 | 523695186 | 8/13/2007 | \$2,398.00 | \$0.00 | \$2,398.00 |
| U138584545 | 523695137 | 8/13/2007 | \$4,225.00 | \$0.00 | \$4,225.00 |
| U138677074 | 523556620 | 8/17/2007 | \$3,726.00 | \$0.00 | \$3,726.00 |
| U138618001 | 854904089 | 8/19/2007 | \$3,998.55 | \$0.00 | \$3,998.55 |
| U138594602 | 854932210 | 8/19/2007 | \$4,090.00 | \$0.00 | \$4,090.00 |
| U138589452 | 523616964 | 8/19/2007 | \$4,405.00 | \$0.00 | \$4,405.00 |
| U138596866 | 523564896 | 8/19/2007 | \$5,871.00 | \$5,115.00 | \$756.00 |
| U138680449 | 523675426 | 8/20/2007 | \$3,315.70 | \$0.00 | \$3,315.70 |
| U138625868 | 854920217 | 8/23/2007 | \$4,015.00 | \$0.00 | \$4,015.00 |
| U138636220 | 523737172 | 8/23/2007 | \$4,700.00 | \$0.00 | \$4,700.00 |
| U138755569 | 523725516 | 8/23/2007 | \$5,203.00 | \$3,945.00 | \$1,348.00 |
| U138728945 | 523776089 | 8/25/2007 | \$4,630.00 | \$4,530.00 | \$100.00 |
| U138625754 | 523615240 | 8/26/2007 | \$2,231.00 | \$0.00 | \$2,231.00 |
| U138644310 | 523645763 | 8/30/2007 | \$3,843.24 | \$0.00 | \$3,843.24 |
| U138700802 | 523734689 | 8/30/2007 | \$4,570.00 | \$0.00 | \$4,570.00 |
| U138797399 | 523786088 | 9/2/2007 | \$4,225.00 | \$0.00 | \$4,225.00 |
| U138786771 | 523830714 | 9/2/2007 | \$2,411.00 | \$0.00 | \$2,411.00 |



MAERSK LINE

6000 Carnegie Boulevard, Charlotte, NC 28209

Special Report

Customer Name: USCA SEABELL INC

Customer Number: 33100231448

Group: P

Statement of Account as of: 10/1/2007 01:01 PM

Transaction Number: Due Date: Origins/Amount: Amount Paid: Outstanding: Days: Supplier Ref: Forwader Ref:

Invoice Number: 523899288 9/2/2007 \$2,511.00 \$0.00 \$2,511.00 30 OE005283

U138798748 854957138 9/2/2007 \$4,090.00 \$0.00 \$4,090.00 30 OE005067 OE005067

U138680434 523657635 9/4/2007 \$4,545.00 \$0.00 \$4,545.00 28 23154 WS 23154 WS

U138710798 523686782 9/4/2007 \$4,005.00 \$0.00 \$4,005.00 28 23154 WS

U138657986 523645584 9/4/2007 \$3,158.00 \$0.00 \$3,158.00 28 23154 WS

U138693346 523746153 9/5/2007 \$8,804.10 \$0.00 \$8,804.10 27 6377

U138734715 523746175 9/5/2007 \$15,496.97 \$0.00 \$15,496.97 27 6377 6377

U138739622 855025585 9/5/2007 \$4,185.00 \$0.00 \$4,185.00 27 OE005164 OE005164

U138688738 523583907 9/8/2007 \$5,036.00 \$0.00 \$5,036.00 24 23154 WS

U138732382 523830735 9/8/2007 \$2,398.00 \$0.00 \$2,398.00 24 OE005222

U138708973 523861062 9/9/2007 \$2,498.00 \$0.00 \$2,498.00 23 OE005323

U138732364 523861061 9/9/2007 \$2,498.00 \$0.00 \$2,498.00 23 OE005357

U138701975 523534439 9/9/2007 \$4,405.00 \$0.00 \$4,405.00 23 23154 WS

U138683333 523555504 9/9/2007 \$3,715.00 \$0.00 \$3,715.00 23 23154 WS 23154 WS

U138756241 523898293 9/9/2007 \$5,081.00 \$0.00 \$5,081.00 23 OE005106

U138707818 523899286 9/9/2007 \$2,498.00 \$0.00 \$2,498.00 23 OE005322

U138747622 523810830 9/9/2007 \$4,665.00 \$0.00 \$4,665.00 23 OE005258

U138702367 855103480 9/9/2007 \$4,425.00 \$0.00 \$4,425.00 23 OE005206 OE005206

U138702333 854845445 9/9/2007 \$4,225.00 \$0.00 \$4,225.00 23 OE004793 OE004793



MAERSK LINE

6000 Carnegie Boulevard, Charlotte, NC 28209

Special Report

| Customer Name: USCA SEABELL INC | | | Group: P | | | Statement of Account as of: 10/3/2007 01:01 PM | | | |
|---------------------------------|--------------------|-----------|-----------|-----------------|-------------|--|------|-----------|---------------|
| Customer Number: 33100231448 | | | | | | | | | |
| Invoice Number | Transaction Number | BL Number | Date | Original Amount | Amount Paid | Outstanding Amount | Days | Slip/Ref | Forwarder Ref |
| U138700172 | 523694722 | | 9/10/2007 | \$3,266.00 | \$0.00 | \$3,266.00 | 22 | 23154 WS | |
| U138734293 | 854967641 | | 9/12/2007 | \$4,015.00 | \$0.00 | \$4,015.00 | 20 | OE005012 | OE005012 |
| U138704867 | 855025601 | | 9/12/2007 | \$3,515.00 | \$0.00 | \$3,515.00 | 20 | OE005165 | OE005165 |
| U138782671 | 523745339 | | 9/16/2007 | \$5,083.00 | \$0.00 | \$5,083.00 | 16 | 23154 WS | 23154 WS |
| U138822603 | 855243246 | | 9/16/2007 | \$2,579.00 | \$0.00 | \$2,579.00 | 16 | OE005342 | OE005342 |
| U138818925 | 523775754 | | 9/17/2007 | \$3,158.00 | \$0.00 | \$3,158.00 | 15 | 23154 WS | 23154 WS |
| U138807543 | 523839471 | | 9/17/2007 | \$9,189.40 | \$0.00 | \$9,189.40 | 15 | 23154 WS | |
| U138769142 | 523878523 | | 9/20/2007 | \$3,611.00 | \$0.00 | \$3,611.00 | 12 | 23154 WS | |
| U138786391 | 523937155 | | 9/23/2007 | \$4,426.00 | \$0.00 | \$4,426.00 | 9 | 523937155 | 523937155 |
| U138818787 | 523797339 | | 9/23/2007 | \$4,351.00 | \$0.00 | \$4,351.00 | 9 | 23154 WS | |
| U138801951 | 524014998 | | 9/26/2007 | \$4,541.00 | \$0.00 | \$4,541.00 | 8 | 23154 WS | |
| U138810555 | 523927142 | | 9/24/2007 | \$4,381.00 | \$0.00 | \$4,381.00 | 8 | 23154 WS | 23154 WS |
| U138818838 | 523927191 | | 9/24/2007 | \$4,501.00 | \$0.00 | \$4,501.00 | 8 | 23154 WS | 23154 WS |
| U138818338 | 523927600 | | 9/26/2007 | \$6,168.00 | \$0.00 | \$6,168.00 | 6 | 23154 WS | |
| U138812044 | 524065556 | | 9/27/2007 | \$1,127.00 | \$0.00 | \$1,127.00 | 5 | 23154 WS | |
| U138789806 | 523948078 | | 9/29/2007 | \$4,371.00 | \$0.00 | \$4,371.00 | 3 | 23154 WS | |
| U138809502 | 523898327 | | 10/1/2007 | \$3,431.00 | \$0.00 | \$3,431.00 | 1 | 23154 WS | |
| U138809529 | 523898315 | | 10/1/2007 | \$3,880.32 | \$0.00 | \$3,880.32 | 1 | 23154 WS | 23154 WS |
| U138809691 | 523970007 | | 10/1/2007 | \$3,880.32 | \$0.00 | \$3,880.32 | 1 | 23154 WS | |



MAERSK LINE

Special Report

6100 Carnegie Boulevard, Charlotte, NC 28208

Customer Name: USCA SEABELL INC
Customer Number: 33100231448

Group: P

Statement of Account as of: 10/3/2007 01:01 PM

| Invoice Number | Transaction Number (if Number) | Due Date | Original Amount | Amount Paid | Outstanding Amount | Days Past Due | Shipper Ref | Forwarder Ref |
|----------------|-----------------------------------|-----------|-----------------|-------------|-----------------------|------------------|-------------|---------------|
| U138809718 | 523970017 | 10/1/2007 | \$4,430.32 | \$0.00 | \$4,430.32 | 1 | | |
| U138809728 | 523969997 | 10/1/2007 | \$3,431.00 | \$0.00 | \$3,431.00 | | 1 23154 WS | |
| U138809620 | 523960406 | 10/1/2007 | \$4,051.00 | \$0.00 | \$4,051.00 | | 1 23154 WS | 23154 WS |
| U138810570 | 523960403 | 10/1/2007 | \$4,051.00 | \$0.00 | \$4,051.00 | | 1 23154 WS | 23154 WS |
| U138810593 | 523979888 | 10/1/2007 | \$2,782.00 | \$0.00 | \$2,782.00 | | 1 23154 WS | |

| | | | | |
|--------------|--------------|-------------|--------------|---------------------|
| Group Total: | \$366,057.10 | \$60,635.00 | \$305,422.10 | Avg. Days: 90.63 |
|--------------|--------------|-------------|--------------|---------------------|

| Customer Name: USCA SEADIE L INC | | Statement of Account as of 10/3/2007 01:01 PM | | Group: C | |
|----------------------------------|------------|---|-----|----------|------------------|
| Customer Number: 33100231448 | | | | | |
| Transaction Number | Ref Number | Date | Day | Amount | Days |
| U138755570 | 523725516 | 9/19/2007 | | \$130.00 | 13 23:54 WS |
| U138822555 | 806500929 | 9/22/2007 | | \$350.00 | 10 USA |
| U138786765 | 523830714 | 9/29/2007 | | \$73.70 | 3 OEO05477 |
| Group Total: | | | | \$553.70 | Avg. Days: 77.50 |